

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

CHARLESTON DIVISION

**IN RE: ETHICON, INC.,
PELVIC REPAIR SYSTEMS
PRODUCTS LIABILITY LITIGATION**

MDL 2327

THIS DOCUMENT RELATES TO THE CASES LISTED ON THE ATTACHED EXHIBIT:

**JOINT MOTION TO DISMISS DEFENDANT
BOSTON SCIENTIFIC CORP. WITH PREJUDICE**

Plaintiffs in the cases listed on the attached Exhibit A and defendant Boston Scientific Corp. (“BSC”) advise the Court that they have compromised and settled all claims between them in these actions, including all counterclaims, cross-claims and third-party claims. Accordingly, plaintiffs and BSC jointly move the Court to dismiss BSC as a defendant in these actions with prejudice and terminate BSC from the docket of the Court the actions, each party to bear its own costs. Other defendants remain pending in these actions, and plaintiffs will continue to prosecute their action against them.

Dated October 28, 2016

Respectfully submitted,

By: /s/ Jon A. Strongman
Robert T. Adams – MO Bar #: 34612
Jon A. Strongman – MO Bar #: 53995
SHOOK, HARDY & BACON L.L.P.
2555 Grand Boulevard
Kansas City, Missouri 64108
Telephone: 816.474.6550
Facsimile: 816.421.5547
rtadams@shb.com
jstrongman@shb.com

**COUNSEL FOR DEFENDANT
BOSTON SCIENTIFIC CORP**

By: /s/ Sean Patrick Tracey
TRACEY & FOX LAW FIRM
440 Louisiana, Suite 1901
Houston, TX 77002
Tel: 800/925-7216
Fax: 866/709-2333
Email: stracey@traceylawfirm.com

**COUNSEL FOR PLAINTIFFS
LISTED ON EXHIBIT A**

CERTIFICATE OF SERVICE

I hereby certify that on October 28, 2016, I electronically filed the foregoing with the Clerk using the CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in these member cases attached as Exhibit A.

By: /s/ Jon A. Strongman
Robert T. Adams – MO Bar #: 34612
Jon A. Strongman – MO Bar #: 53995
SHOOK, HARDY & BACON L.L.P.
2555 Grand Boulevard
Kansas City, Missouri 64108
Telephone: 816.474.6550
Facsimile: 816.421.5547
rtadams@shb.com
jstrongman@shb.com

**COUNSEL FOR DEFENDANT
BOSTON SCIENTIFIC CORP**

EXHIBIT A

Civil Case Number	Case Name
13-cv-30332	Bowden, Betty and Francis Bowden v. Ethicon, Inc., et al.
13-cv-28164	Lush, Jeanette and Robert Lush v. Ethicon, Inc., et al.
13-cv-28165	Johnson, Pamela v. Ethicon, Inc., et al.
13-cv-28661	Lugo, Kathy v. Ethicon, Inc., et al.
13-cv-28663	O'Bryant, Veronica and Antoine O'Bryant v. Ethicon, Inc., et al.
13-cv-30285	Kaltz-Harri, Joan v. Ethicon, Inc., et al.
13-cv-32923	Westbrook, Mary L. and Walter H. Westbrook, Jr. v. Ethicon, Inc., et al.
14-cv-15543	Keck, Cheri v. Ethicon, Inc., et al.
14-cv-15549	Hunting, Carol and Frederick Hunting v. Ethicon, Inc., et al.
14-cv-26763	Wright, Kimberly and Bryan Wright v. Ethicon, Inc., et al.
14-cv-29628	Grissom, Rebecca and Bob Grissom v. Ethicon, Inc., et al.
15-cv-11922	Morris, Sandra and Frederick Morris v. Ethicon, Inc., et al.